

February 25, 1992

SDMS Document



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Via Certified-Receipt Requested

Mr. Dennis Hart
Administrator, Wastewater Facilities Regulation
New Jersey Department of Environmental Protection
Bureau of Industrial Discharge Permits
CN-029
Trenton, New Jersey 08625

**RE: Draft SIU Permit - NJPDES No. NJ0081507
Former Hexcel Corporation Facility; Lodi, NJ**

Dear Mr. Hart:

The following comments are submitted in response to the Public Notice regarding the draft New Jersey Pollutant Discharge Elimination System (NJPDES)/Significant Indirect User (SIU) Permit issued to Hexcel Corporation (NJPDES-SIU Permit No. NJ0085107).

Comment No. 1

Pretreatment of ground water will include oil/water separation in addition to the equalization, air stripping, filtration, and granular activated carbon adsorption. The description of pretreatment under "Description of Facility Operations" on the SIU Fact Sheet should be modified to include oil/water separation.

Comment No. 2

Part III-L specifies that discharge point DSN001 shall be for the discharge of pretreated basement seepage water and ground water only. It is requested that this be modified to include pretreated stormwater collected in the DNAPL containment area and pretreated rinse water from decontamination of pretreatment system and monitoring system equipment, in addition to pretreated basement seepage water and ground water.

Comment No. 3

The "Classification of Industrial Wastewater Treatment System" scoring sheet should be modified to reflect additional wastewater pretreatment processes.

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Under Section D, which lists primary pretreatment processes, additional treatment will include pH adjustment (1 point), oil separation (3 points), chemical coagulation/flocculation (5 points), and chemical addition (2 points). Under Section G, which lists sludge handling and disposal processes, additional treatment will include sludge dewatering (4 points). The total number of points will be increased from 51 to 66. The facility class will remain as N3.

Please let me know if you have any questions regarding these comments.

Sincerely,



A. William Nosil

Corporate Environmental Engineering Manager

cc: Jeffrey Thein; NJDEPE
Gary Sanderson; NJDEPE
Frank D'Ascensio; PVSC
Lisa Bromberg; Porzio, Bromberg & Newman
Renée van de Griend; ENVIRON
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